# UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

| BROCK FREDIN,                   | Dlaintiff   | Case No. 17-CV-3058         |
|---------------------------------|-------------|-----------------------------|
| against<br>LINDSEY MIDDLE       | Plaintiff,  | DECLARATION OF BROCK FREDIN |
|                                 | Defendant.  | _                           |
| BROCK FREDIN,against            | Plaintiff,  | Case No. 18-CV-466          |
| GRACE MILLER,<br>CATHERINE SCHA | AEFER,      | DECLARATION OF BROCK FREDIN |
|                                 | Defendants. |                             |
| BROCK FREDIN,against            | Plaintiff,  | Case No. 20-CV-1929         |
| JAMIE KREIL,                    | Defendant.  | DECLARATION OF BROCK FREDIN |

STATE OF WISCONSIN }
ss:
COUNTY OF SAINT CROIX }

BROCK FREDIN, being duly sworn, deposes and says:

1. I am the Plaintiff in the above-captioned proceedings. I submit this declaration in support of my leave to file a motion for reconsideration in *Fredin v. Kreil* in the district court.

### **AUTHENTICATION OF DOCUMENTS**

- 2. Attached hereto as **Exhibit A** is a true and correct copy of Lindsey Middlecamp, Catherine Schaefer, Grace Miller, and Jamie Kreil's @CardsAgstHrsmt tweets directed at me present to this day.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of Lindsey Middlecamp, Catherine Schaefer, Grace Miller, and Jamie Kreil's tweets directed at me on the account @webster.
- 4. Attached hereto as <u>Exhibit C</u> is a true and correct copy of K. Jon Breyer's October 6, 2020 emails requesting that content be removed as an act of good faith for a few hours during settlement negotiations.
- 5. Attached hereto as **Exhibit D** is a true and correct copy of November 18, 2020 comments directed at me online originating from Defendants.

### MISREPRESENTED SETTLEMENT NEGOTIATIONS

6. As the attached emails show, on October 8, 2020 K. Jon Breyer reached out to me that he <u>independently</u> found the videos and websites and that he would not negotiate or engage in settlement negotiations while they still appear. In effect, K. Jon Breyer

CASE 0:18-cv-00466-SRN-HB Doc. 223 Filed 11/25/20 Page 3 of 73

demanded the content be taken down for two (2) hours as an act of good faith during the

settlement negotiations. I honored this to the extent settlement negotiations were being

decided. K. Jon Breyer and Ann M. Lockner are being totally dishonest and deceptive

when they claim I used any content online to try to exploit a favorable settlement. At no

time was I ever trying to extort a favorable settlement with the videos or websites. K. Jon

Breyer and Anne Lockner have presented no evidence to corroborate their false allegation

that has now unfortunately been accepted by this Court. This is attached as Exhibit B.

7. It is unfortunate that this Court accepted K. Jon Breyer and Ann Lockner's

misrepresentations during settlement negotiations. It is even more unfortunate that the

Court repeated these misrepresentations multiple times in the November 23, 2020 Order

and used these representations as justification for issuing an unconstitutional prior restraint

on my free speech.

8. Furthermore, Defendant Lindsey Middlecamp sent multiple direct messages

to me in October and November 2020 and created an account "Brock Fredin Harassment

Response Center". This is attached as Exhibit D.

Dated: November 24, 2020

Saint Croix Co., WI

s/ Brock Fredin

**Brock Fredin** 

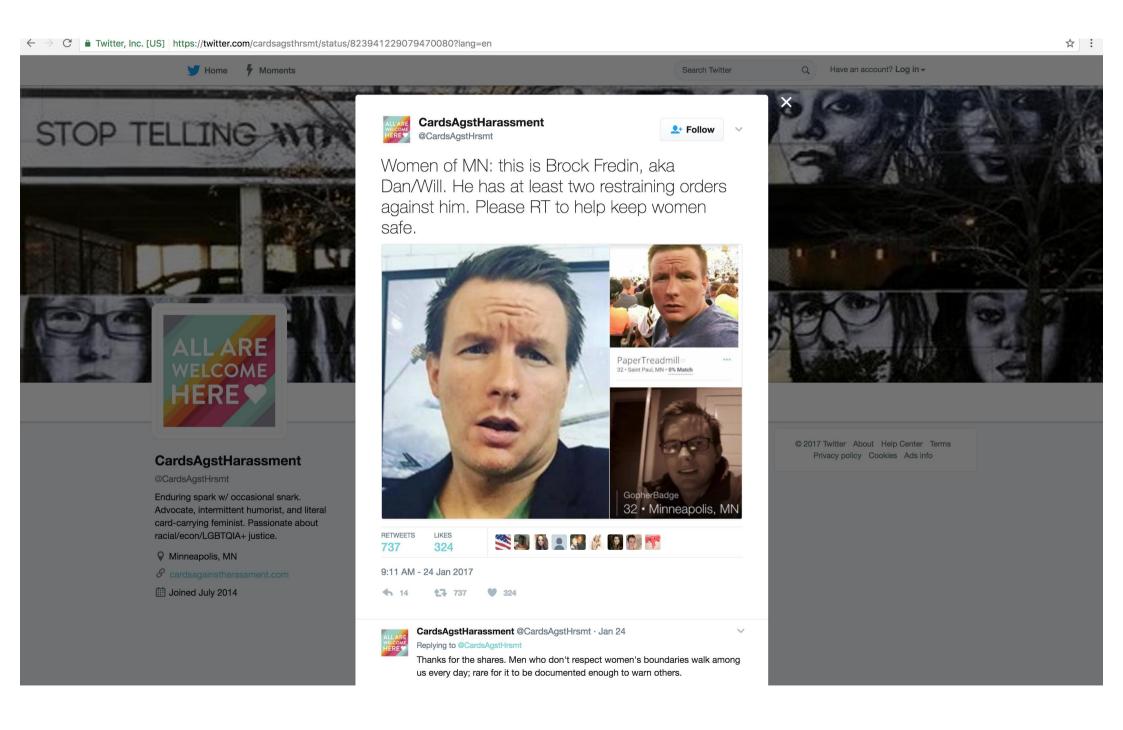
Saint Croix Co., WI 54002

Ble Fel:

(612) 424-5512 (tel.)

brockfredinlegal@icloud.com Plaintiff, Pro Se







Replying to @CardsAgstHrsmt

Tip: if you are described as potentially predatory, perhaps sending emails like this is not the best way to establish how not scary you are:

Date: Wed, Feb 1, 2017 at 5:21 AM Subject: Ethics Concern To: You wrote an article about 'shirtless shamming' in Minneapolis. That person/account recently did 'victim shamming' someone who was the target of revenge porn. There is a criminal investigation underway in St. Paul. We know the stalker is named We'd like to know if you know Lindsay's name from the Cards Against Harassment account. We can share any information about the criminal investigation into their stalking and criminal defamation. They released a victim's work information publicly and created online sex profiles/ads soliciting sex without consent that sent many emails to the victim. This is against the law. If you stand for gender equality, justice, etc... You'll help to get Lindsay's name. Give it to Police dept or Police Dept. Very valuable to prevent revenge porn. We need it immediately. We will peacefully protest the Huffington Post for endorsing revenge porn if you don't cooperate.









Ryan L. @ryanlindberg



Also Brock Fredin there are a lot of people on twitter who won't write emails but will just gleefully dick-punch you into an event horizon



### CardsAgstHarassment @CardsAgstHrsmt

Replying to @CardsAgstHrsmt

My longer-winded way of saying "Not today, Brock Fredin. Not tomorrow, either."

LIKE

1

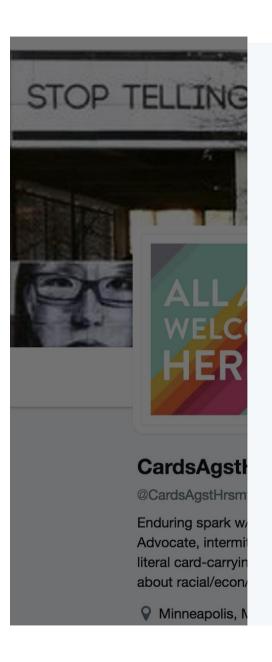


4:08 PM - 1 Feb 2017





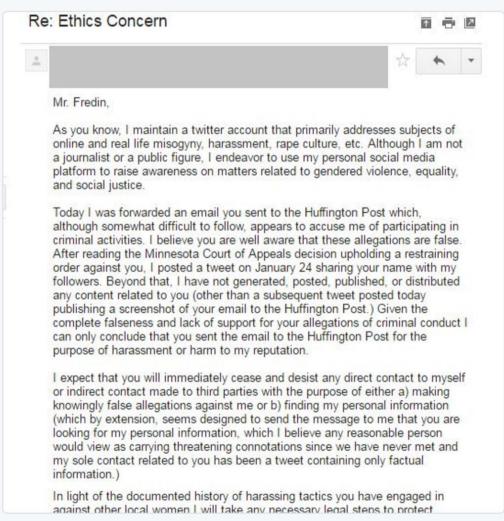


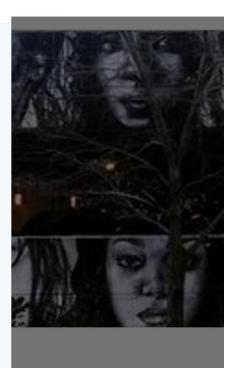




47 24 00 100

My longer-winded way of saying "Not today, Brock Fredin. Not tomorrow, either."





@CardsAgstHrsm

Enduring spark was Advocate, intermitational card-carryin



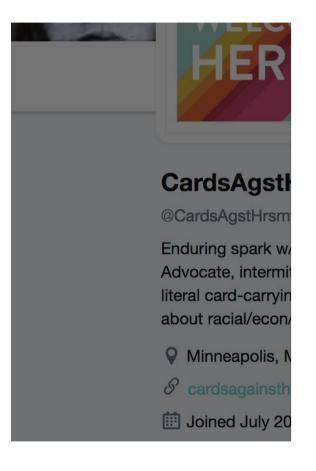
#### CardsAgstHarassment @CardsAgstHrsmt · Feb 1

To those who RT or reply to this thread: my DMs are open. Please let me know if he targets you, your family, your employer, etc. Stay safe.











Replying to @CardsAgstHrsmt

Folks: a person WHO DOES NOT EVEN FOLLOW ME liked the tweet re Brock Fredin, so he sent this email about her to retaliate. This is... a lot.

Date: Wed, Feb 1, 2017 at 4:59 PM Subject: Ethics Concern

She recently participated in a Twitter campaign shamming a victim of revenge porn. This campaign also released the victim's work information publicly to 20k viewers of the post.

We are asking you to immediately end any relationship with her.

If you do not endorse stalking or revenge porn, we ask that you end any future relationship, and remove any of her content/association from your site.

I'd also like to connect with a reporter about an ongoing campaign that's related to a digital 'reverse brock turner' type of tactic. We have a criminal investigation with the St. Paul Police Dept.





The cost of naming, identifying, or talking about harassment & abuse women face should not be silence coerced through more harassment. No.





1 more reply





Replying to @CardsAgstHrsmt

I am just so done w/ predatory people (can we agree? men) intimidating individuals from speaking out, thereby avoiding real accountability.



1



3





Replying to @CardsAgstHrsmt

Mostly kidding but...there is at least something \*ALMOST\* gratifying about someone trying to track me down by contacting @HuffingtonPost.



3







Replying to @CardsAgstHrsmt

Like, nailed it, scary man. Emergency contact at the doctor's office?

@HuffingtonPost, duh. My student loans? Co-signed by @HuffingtonPost.



2







V

Replying to @CardsAgstHrsmt

Earlier today I was just surprised. But the reality of a strange man attempting to track me down because I dared speak his name is...scary.

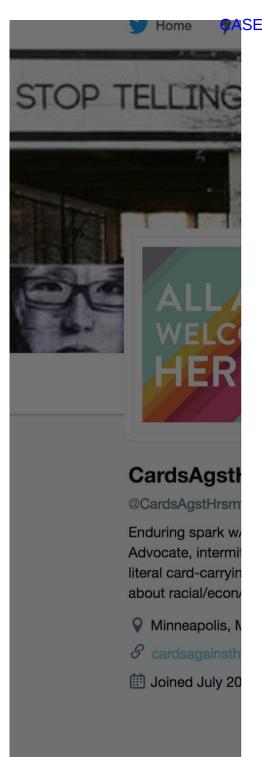


4

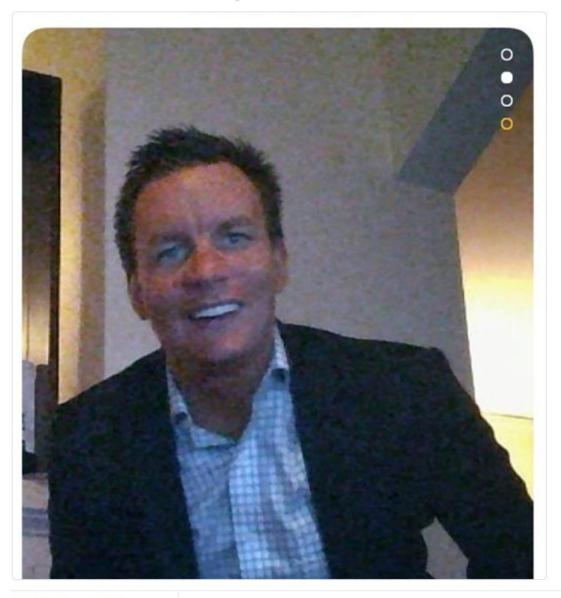


2





Update: alias "Felix" on Bumble. Please share if you have friends using dating apps/sites in the Twin Cities & DM if you've been victimized.





LIKES 54













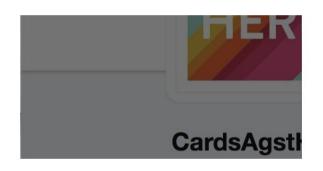




Replying to @CardsAgstHrsmt

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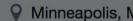


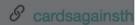




@CardsAgstHrsm

Enduring spark wa Advocate, intermit literal card-carryin about racial/econ/





iii Joined July 20



### CardsAgstHarassment @CardsAgstHrsmt · Feb 6

Regular programming to resume for the most part but I just...oof. I cannot stand knowing these people are in my community targeting women.

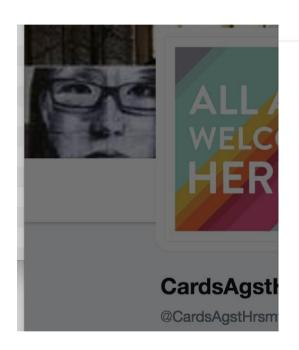




Lindsay Goldner @linzlovesyou · Feb 6 jesus what a fucking psycho. I've come across borderline dudes but thankfully



never that bad (online anyways)





Replying to @CardsAgstHrsmt

Thank you, @citypages, for helping shed light on this. Hoping other women living in fear realize they aren't alone.



Accused Minneapolis-St. Paul stalker Brock Fredin i...
He'd found two victims. Until they found each other.
citypages.com

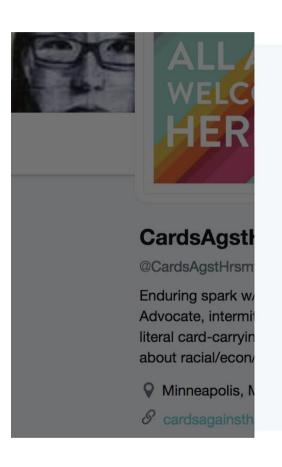




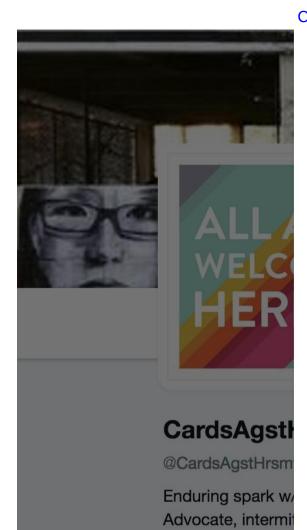












literal card-carryin about racial/econ/

& cardsagainsth

Joined July 20

Minneapolis, N

### CardsAgstHarassment @CardsAgstHrsmt · Feb 22

The power of sharing. Within hours of the stalking post going up, a rape survivor comes forward. He remains free. (Shared w/ her permission)

8 mins - @

#### http://www.citypages.com/.../accused-stalker-brock-.../414395703

I've been debating whether or not to post this, but I feel I must. This man raped me 7 years ago. The St. Louis Park police didn't take me seriously then, but I hope they will see now that he is a predator. As I type these words, my hands are shaking, my breath is short, and I have a deep, pulsing ball in the pit of my stomach. This is the physical manifestation of the PTSD I have as a result of him violating my body and robbing me of my dignity. I resent the fact that the police let my case drop. It would have spared his future victims from the heartache and trauma they are most certainly enduring now.





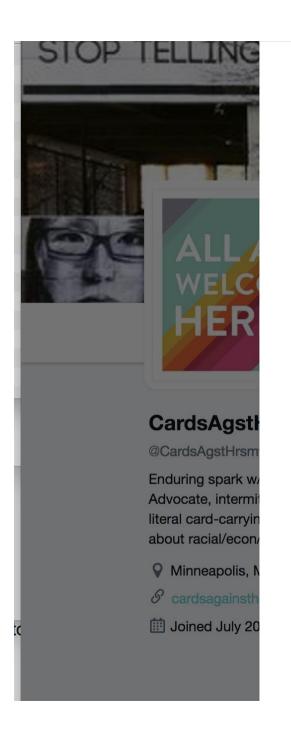


I wonder if that's a lazy neg, i.e. "You'd better prove to me you're sexually attracted to men! And by men I mean me. Duh."





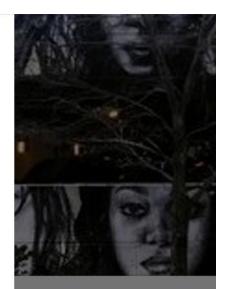




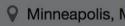
Replying to @CardsAgstHrsmt

Update: alias "Felix" on Bumble. Please share if you have friends using dating apps/sites in the Twin Cities & DM if you've been victimized.





@CardsAgstHrsm Enduring spark wa Advocate, intermit literal card-carryin



about racial/econ/



### CardsAgstHarassment @CardsAgstHrsmt · Feb 6

Regular programming to resume for the most part but I just...oof. I cannot stand knowing these people are in my community targeting women.







1 more reply

Advocate, intermit literal card-carryin about racial/econ/





Replying to @CardsAgstHrsmt

Thank you, @citypages, for helping shed light on this. Hoping other women living in fear realize they aren't alone.



Accused Minneapolis-St. Paul stalker Brock Fredin ...
He'd found two victims. Until they found each other.
citypages.com





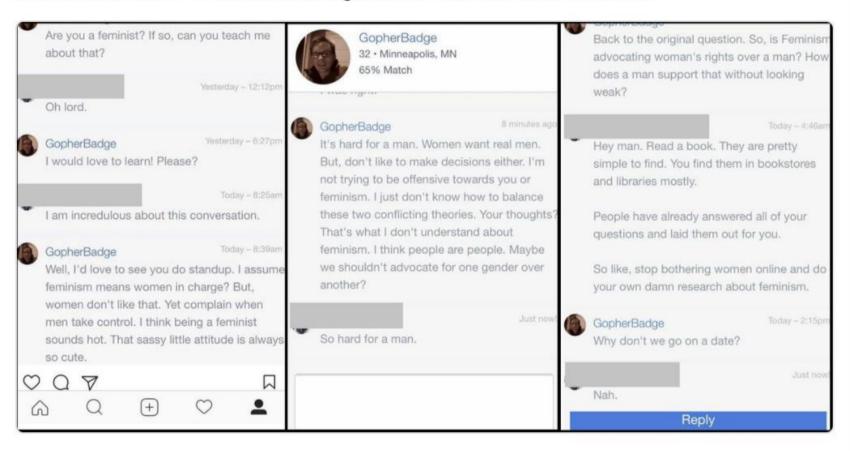






Replying to @CardsAgstHrsmt

(Shared with permission). Apparently this man is a student of the "teach me about feminism!" school of disingenuous conversation starters:











Replying to @CardsAgstHrsmt

The power of sharing. Within hours of the stalking post going up, a rape survivor comes forward. He remains free. (Shared w/ her permission)





Replying to @CardsAgstHrsmt

A direct statement shared with me by one of Brock Fredin's victims on some of the details absent from the City Pages article:

As the article describes, I requested a harassment restraining order after multiple instances of unwanted contact. I threatened to call the police twice before even seeking the order, so the unwanted contact was well over the line.

One day, not long after I'd submitted the request, a policeman came to my door to deliver a document - it was a copy of a 24page order for protection request (which is for victims of domestic abuse) Brock had made against me. Reading through it was one of the worst moments of my life.

Despite the fact that I never harassed, harmed, or threatened to harm Brock, in the request, Brock had checked the boxes saving "I am reasonably in fear of physical harm from the respondent" and that "The respondent engaged in acts of harassment or stalking." He described me as having extreme alcoholic and violent tendencies, and threatening to kill several people. In the request, he took the liberty of diagnosing me with multiple mental health issues, including PTSD, and requesting that the court prohibit me from owning a firearm (I own a handgun - one of the few things that helped me feel safe throughout this ordeal).

He also asked the court that I be ordered to attend a domestic abuse program, to get an alcohol/chemical dependency evaluation, and be forced into mental health treatment. Finally, he requested that the court order me to pay him exactly \$2201 for his trouble. His request was denied, but Brock had the opportunity to make his case at our court hearing.

Brock must not have been that afraid of me, because in the hearing, he told the judge that he would withdraw this order for protection request if I withdrew my harassment restraining order request. Clearly this was an effort to silence me. Though I didn't back down from seeking the restraining order (which was granted), I stayed silent as he smeared my reputation on the internet and wrote open letters to me from social media accounts for months (sometimes saying he loves me, sometimes calling me a bully, or worse). I'm so glad this is in the open now. I don't know if there will ever be justice for what happened to me and to Catherine and so many others. Throughout this totally horrific episode, I keep getting told that much of his behavior is either legal or almost impossible to prove in court. But at least this way other women will be warned and I hope that it will encourage them to seek justice, or at least protection, whatever the obstacles.









Replying to @CardsAgstHrsmt

I'm not going to amplify his distorted views but I want to be clear: I am not friends with, let alone related to, Brock Fredin's victims.

- releases large scale Twitter smear campaign following the appeal through her Sister's account (cowardly).
- 9) Releases a highly inaccurate, dramatic, and false City Pages hit piece.



Replying to @CardsAgstHrsmt

I use this twitter account to discuss feminism, gender violence, etc. I do not need to be connected to victims to believe & support them.





V



Replying to @CardsAgstHrsmt

My anonymity should not be used as an excuse to target or blame random people who have nothing to do with my tweets but are easier to find.









Replying to @CardsAgstHrsmt

Here is what we should all expect of perpetrators who find themselves backed into a corner facing public accountability like Brock Fredin:



1







Replying to @CardsAgstHrsmt

1. Take stock. Do not contact any of your victims to apologize or ask for forgiveness, but tell the authorities their names & what you did.









Replying to @CardsAgstHrsmt

This includes each & every woman who has had to ask you more than once to cease contact. Not just the 2 who took legal action. It's a list.









Replying to @CardsAgstHrsmt

Every person you contacted from new numbers or accounts to avoid being ignored is a victim whose info you should give to the police.



1



2





Replying to @CardsAgstHrsmt

2. Stop blaming other people for spreading word about your behavior. Stop trying to retaliate against the people you blame. Be accountable.



1



3





Replying to @CardsAgstHrsmt

3. Offer a plea deal that takes accountability for the scope of people you've hurt & plans a path forward.









Replying to @CardsAgstHrsmt

Because let's be real: multiple people have come forward describing stalking, harassment, and now, rape. This is not a misunderstanding.











Friday is date night which means worrying for women encountering Brock Fredin/Dan/Will/Felix/etc.alias on dating apps. DM me if you see him.



## CardsAgstHarassment @CardsAgstHrsmt

Women of MN: this is Brock Fredin, aka Dan/Will. He has at least two restraining orders against him. Please RT to help keep women safe.





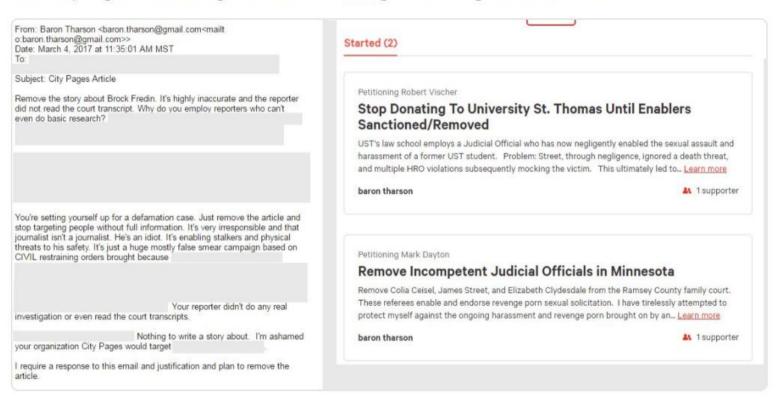






Replying to @CardsAgstHrsmt

In which Brock Fredin/"Baron Tharson" accuses CityPages of defamation & wants judges who've granted restraining orders against him removed:













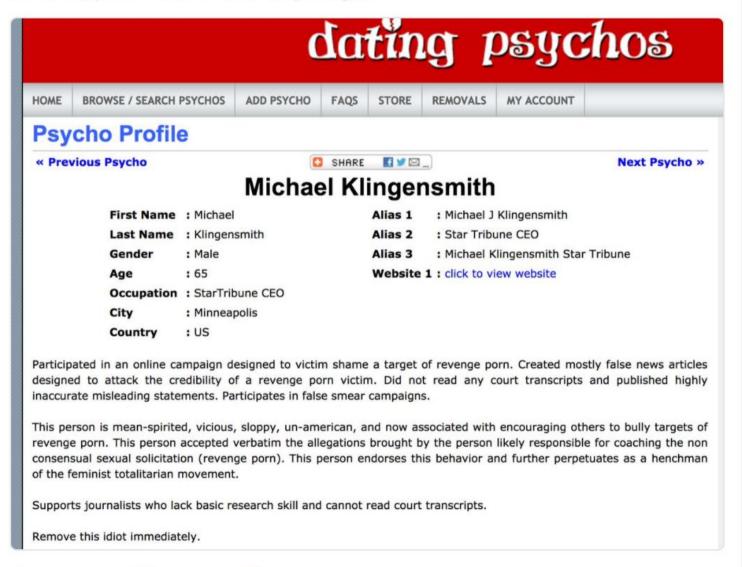
Replying to @CardsAgstHrsmt

Newspaper posts story about serial harasser Brock Fredin.

He demands it be removed.

They don't.

What happens next...will not surprise you:









Replying to @CardsAgstHrsmt

TFW you publicly pledge to be "relentless" & "merciless" against women whose repeated message has simply been: do not stalk & harass women.





CardsAgstHarassment Retweeted



Ryan L. @ryanlindberg · Apr 5

Replying to @CardsAgstHrsmt

THE HARASSMENT WILL CONTINUE UNTIL MORALE IMPROVES









Ryan L. @ryanlindberg · Apr 5 THE HARASSMENT WILL CONTINUE UNTIL MORALE IMPROVES







Ryan L. @ryanlindberg · Mar 21

Replying to @CardsAgstHrsmt

did you hear the news? Brock is, actually, NOT mad on the Internet.











Angry Trans™ @kaurwn · Mar 21

Replying to @CardsAgstHrsmt

i love that brock has no idea what victim shaming or revenge porn are









Catrina @SoNotKidding · Mar 21

Replying to @CardsAgstHrsmt

Oh FFS



#### brock fredin









All

News

Videos

**Images** 

Maps

More

Settings

Tools

About 25,200 results (0.69 seconds)

Accused Minneapolis-St. Paul stalker Brock Fredin is writing a horror ... www.citypages.com/news/accused-stalker-brock-fredin-is-writing.../414395703 ▼ Feb 22, 2017 - Brock Fredin has restraining orders from two women. Neither victim's ... Brock Fredin was cute and seemed like a good match. They agreed to ...

You've visited this page many times. Last visit: 5/5/17

#### MILLER v. FREDIN | No. A16-0613. | Leagle.com

www.leagle.com/decision/.../MILLER%20v.%20FREDIN ▼

Jan 23, 2017 - Grace Elizabeth Miller, petitioner, Respondent, v. Brock Fredin, Appellant. ... The district court granted Grace Miller a harassment restraining order against Brock Fredin after Miller ended their romantic relationship. ... He maintains that the district court failed to make a ...

You've visited this page many times. Last visit: 5/5/17

CardsAgstHarassment on Twitter: "Women of MN: this is Brock Fredin ... https://twitter.com/cardsagsthrsmt/status/823941229079470080?lang=en ▼

Jan 24, 2017 - Women of MN: this is Brock Fredin, aka Dan/Will. He has at least two restraining orders against him. Please RT to help keep women ...

#### Brock Fredin in Minnesota - 1 Record Found - Instant Checkmate

https://www.instantcheckmate.com > People Search > Last Name (F) ▼

Brock Fredin was found once in our database. This match was found in 3 cities including Minneapolis, Minnesota, Burnsville, Minnesota & Saint Paul, ...

You've visited this page many times. Last visit: 4/30/17

### Images for brock fredin













Report images

#### My Account

Where you'll find tools to secure and manage your Google Account and control your data



**GO TO MY ACCOUNT** 

Feedback



From Google Contacts Only you can see this result

### **Brock Fredin**

Update your profile

Other: brockf12@gmail.com





→ More images for brock fredin

B



Tony Mebster- - 60466-SRN-HB/1206. 223 Filed 11/25/20 Page 52 of 73 I don't think he's endorsing @mikemullen\_ on LinkedIn.

Journalism, by declaring and waging publicity wars
against his targets. He has combined with others to
ruin his targets for the sole purpose of fatiguing them
Into compliance with his radical agenda.



Tony Webster 🧼 @webster · Mar 7

I feel like it's not a great look, in your handwritten defamation complaint mailed from jail, to call the local paper the "Star and Sickle," to say a reporter has a "yellow journalism career," or to complain about [checks notes] ... reporters seeking comment from police?

Defendant mullen is currently employed as a news editor

for the city pages.

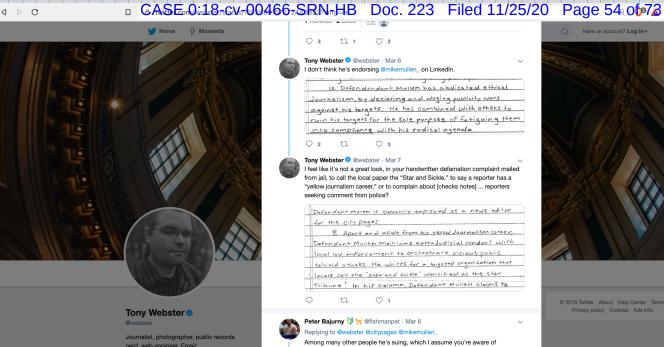
8. Apart and aside from his yellow Journalism career,

Defendant Mullen maintains extraJudicial conduct with

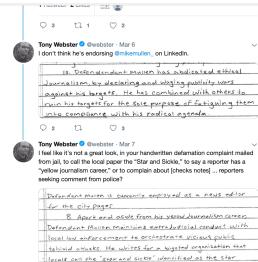
local law enforcement to orchestrate vicious public

tabioid attacks. He writes for a bigoted organization that

Defendant mullen is currently employed as a news editor for the city pages. 8. Apart and aside from his yellow Journalism career, Defendant Mullen maintains extraJudicial conduct with local law enforcement to orchestrate vicious public tablaid attacks. He writes for a bigoted organization that locals call the "star and sickle" identified as the star In his column, Defendant Mullen claims to



nerd, web engineer. Email: tony@tonywebster.com



Peter Bajurny V 😭 @fishmanpet · Mar 6

17

Replying to @webster @citypages @mikemullen\_

O 1

Among many other people he's suing, which I assume you're aware of

Tribune ' In his column, Defendant Mullen claims to

ſΩ  $\bigcirc$  1

Tony Webster @ @webster · Mar 6

Extremely aware and receiving alerts on every filing in every case. Unrelated, I used to work with Brock at a web development shop in town.

Q 1 17

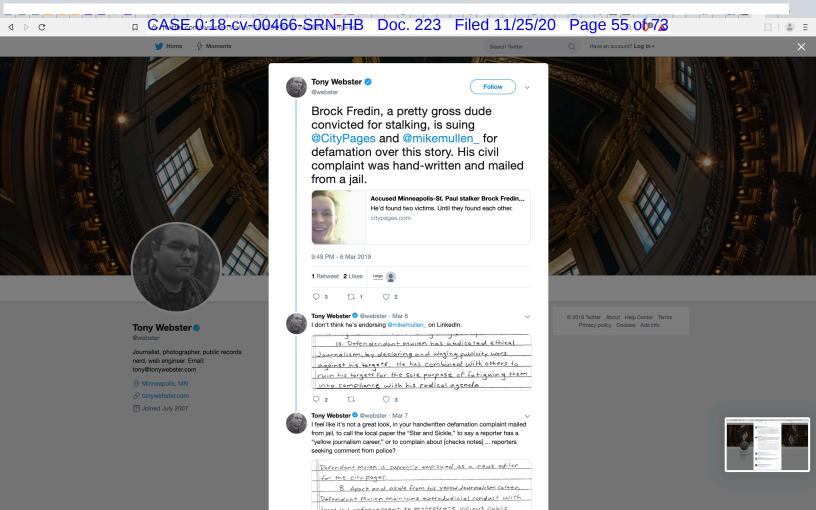
1 more reply

my lady of the various sorrows @ravenlily · Mar 6 Replying to @webster @citypages @mikemullen\_

♡ 1

Ew. Thanks for the heads up





# CASE 0:18-cv-00466-SRN-HB Doc. 223 Filed 11/25/20 Page 56 of 73

Defendant mullen is currently employed as a news editor

for the city pages 8. Aport and aside from his yellow Journalism career Defendant Musien maintains extraJudicial conduct with local law enforcement to orchestrate vicious public tobooks attacks. He writes for a bigoted organization that locals call the "star and sickle" identified as the star

Tribune ' In his column, Defendant Muller claims to



I was preparing terms and then I came across these: https://www.youtube.com/watch?v=pWPAHCN3iZQ

and http://www.kjonbreyer.com/

I will not have any settlement discussions with you until these (or any others) are taken down.

# \*\*FOR SETTLEMENT PURPOSES ONLY\*\*

Let's see if you're telling the truth and if you're negotiating in good faith. The website and video (which only contains truthful information) has been removed. I expect reasonable terms by end of the working day (5PM CST).

\*\*FOR SETTLEMENT PURPOSES ONLY\*\*

See More



Re: Fredin v. Miller, Case No. 18-CV-466

To: brock fredin

Thank you. I appreciate it.

I can't respond by 5:00 today, but can give you a proposal tomorrow by 5:00 pm. I have a deposition that will last most of the day or I'd get it to you sooner.

From: brock fredin < brockfredinlegal@icloud.com >

Sent: Thursday, October 8, 2020 1:22:31 PM

To: Breyer, K. Jon < Jon.Breyer@KutakRock.com > Subject: Re: Fredin v. Miller, Case No. 18-CV-466

[ CAUTION - EXTERNAL SENDER ]

See More from brock fredin









Nickolas Cruiser · 5 days ago







Nickolas Cruiser • 5 days ago



















































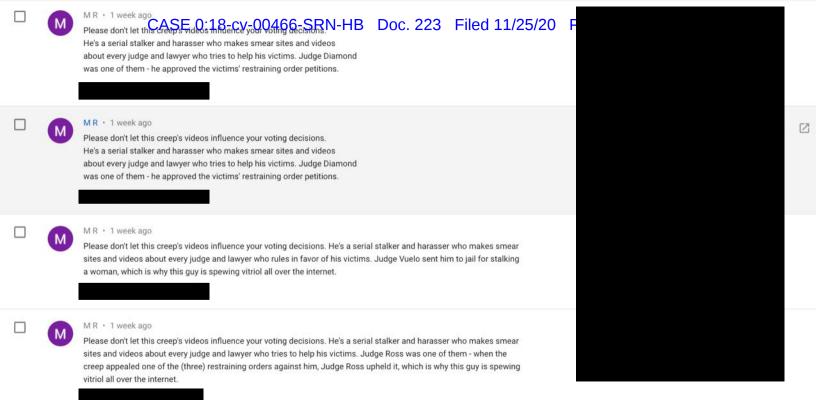
This post was created by Brook Fredin, a serial rapid,

staker, and harasser of women in the Minneapolis/DI.

area, Brook Fredit frequency are not region to your control of solutions, by along the on the

harassment restaining order vication) and is currently availing trial.

Ofminal defamation is a serious officese in the state of Minnesota, purishable by up to one year in prison.



He's a serial stalker and harasser who makes smear sites and videos about every judge and lawyer who rules in favor of his victims. Judge

Vuelo sent him to jail for stalking a woman, which is why this guy is spewing vitriol all over the internet.

Show less

MCASE 0:18-cv-00466-SRN-HB Doc. 223 Filed 11/25/20 Page 73 of 73 @Jill Stefansen Please don't let this creep's videos influence your voting decisions. He's a serial stalker and

harasser who makes smear sites and videos about every judge and lawyer who tries to help his victims. Judge Ross was one of them - when the creep appealed one of the (three!!!) restraining orders against him. Judge Ross upheld it, which is why this guy is spewing vitriol all over the internet.